

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JUANA DOE I et al.,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	C.A. No. 17-1494-JFB-SRF
	§	
INTERNATIONAL FINANCE	§	PUBLIC REDACTED VERSION
CORPORATION, and IFC ASSET	§	
MANAGEMENT COMPANY, LLC,	§	
	§	
Defendants.	§	

STIPULATION AND [PROPOSED] ORDER STAYING CASE

The undersigned Parties have conferred by and through counsel and, subject to the Court's approval, HEREBY STIPULATE AS FOLLOWS:

WHEREAS, Plaintiffs filed their complaint in this case on October 24, 2017 (D.I. 1);

WHEREAS, Defendants filed their Renewed Motion to Dismiss the Amended Complaint (D.I. 53) on April 22, 2018, and the briefing on the Motion concluded on July 12, 2019 (D.I. 60);

WHEREAS, [REDACTED]

[REDACTED] the Parties agree that

the instant litigation should be stayed for 90 days.

WHEREAS, no Party will suffer undue prejudice as a result of the stay, [REDACTED]

THEREFORE, IT IS HEREBY STIPULATED, by and between the Parties, subject to the approval of the Court that all proceedings are stayed for 90 days.

Dated: February 18, 2020

Respectfully submitted,

/s/ Travis S. Hunter

Susan Hannigan (#5342)
Travis S. Hunter (#5350)
RICHARDS, LAYTON & FINGER, P.A.
One Rodney Square
920 N. King Street
Wilmington, Delaware 19801
(302) 651-7700
hannigan@rlf.com
hunter@rlf.com

Jeffrey T. Green
Frank R. Volpe
Marisa S. West
Spencer D. Driscoll
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C., 20005
(202) 736-8291
jgreen@sidley.com
fvolpe@sidley.com
mwes@sidley.com
sdriscoll@sidley.com

Counsel for Defendants

/s/ Misty A. Seemans

Misty A. Seemans, DE Bar # 5975
O.P.D. (Pro Bono; cooperating attorney with
EarthRights International)
820 North French Street
Third Floor
Wilmington, DE 19801
Tel: (302) 577-5126
Email: misty@earthrights.org

Marissa Vahlsing
marissa@earthrights.org

Marco Simons
marco@earthrights.org

Richard Hertz
rick@earthrights.org

Sean Powers
sean@earthrights.org

EARTHRIGHTS INTERNATIONAL
1612 K Street NW, Suite 401
Washington, D.C., 20006
Tel: (202) 466-5188

Jonathan Kaufman
LAW OFFICE OF JONATHAN KAUFMAN
341 W. 24th St. Apt. 21C
New York, NY 10011
Tel: (212) 620-4171

Judith Brown Chomsky, *pro hac vice pending*
LAW OFFICES OF JUDITH BROWN CHOMSKY
Post Office Box 29726
Elkins Park, PA 19027
Tel: (215) 782-8367

Jose Luis Fuentes
Law Offices of Jose Luis Fuentes
2625 Alcatraz Ave, No 213
Berkeley, California 94705
Tel: (213) 500-2500
jlflaw@att.net

Counsel for Plaintiffs

SO ORDERED this _____ day of February 18, 2020, that this action shall be stayed for 90 days.

Hon. Sherry R. Fallon